

Comments Regarding RM-10781, New HF privileges for Technician class licensees.

I agree with the petitioner that some form of entry level hf cw privileges, which existed before the Commission discontinued issuing new Novice class licences, should be reinstated.

However, Mr. Beauregard's petition requests adding new segments to our already overly complicated subband system, which has evolved into a complex matrix of band segments based on combinations of licence class and emission modes. I do not feel it would be in the public interest to add further complications to this system. On the contrary, I believe the amateur radio subband system should be simplified by eliminating some of the existing segmentation.

I disagree with Mr. Beauregard's proposal to introduce additional Technician voice/image privileges below 30 MHz. This would serve no useful purpose, especially considering that Novices and Technicians already enjoy voice privileges at 28.300-28.500 MHz. Furthermore, the proposed voice subbands on 80 and 40 metres fall in what are already the most heavily congested portions of the existing phone segments. I fear that the congestion this proposal would cause would render these segments virtually unusable during prime operating hours.

The present restriction of 28 MHz Novice/Technician voice privileges to SSB-only serves no useful purpose. Novices and Technicians using this segment should enjoy the same "Phone" privileges as all other licensees.

As a counter-proposal, I suggest allowing Novices and Technicians to transmit cw only, on all amateur frequencies presently available to General class licensees, with new frequency privileges limited to low power on the order of 10 watts to the antenna.

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